

UNITED STATES DISTRICT COURT  
for theUnited States District Court  
Southern District of Texas  
FILEDSouthern District of Texas  
**SEALED**

OCT - 9 2015

United States of America  
Jesus Lazaro <sup>V</sup> PEREZ  
YOB: 1987  
Citizenship: United StatesCase No. **M-15-1772-M**

David J. Bradley, Clerk

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 20, 2015 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
8 U.S.C. § 1324 (a)(1)(A)(ii)	Knowing or in reckless disregard of the fact that Sara Zacarias-Chacaj, who was an alien, has come to, entered, or remain in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

OK to file. TMT

  
Complainant's signatureTomas Mora, HSI Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Date: 10/9/2015 10:04 am  
Judge's signatureCity and state: McAllen, TexasUnited States Magistrate Judge Peter Ormsby  
Printed name and title

ATTACHMENT A

On September 22, 2015, Homeland Security Investigations, McAllen, Texas (HSI McAllen), received information from the New Bedford, Massachusetts Police Department (NBPD) that Sara ZACARIAS-Chacaj, a citizen of Guatemala with no legal status to be in the United States, had been smuggled into the United States on September 14, 2015. The information stated alien smugglers were threatening to rape and kill ZACARIAS-Chacaj if her family did not send them additional money. The report details names and phone numbers of smugglers who had already collected and smugglers who were attempting to collect more smuggling fees.

Pursuant to an investigation conducted on September 22, 2015, ZACARIAS-Chacaj was encountered in Donna, Texas and three subjects, Roberto CHAVEZ-Barrios, Florencia SANTIAGO-Antonio and Victor Francisco GAMBOA-Angeles were subsequently arrested and charged with criminal violations of alien smuggling related to the smuggling of ZACARIAS-Chacaj.

CHAVEZ-Barrios stated he contacted an unidentified human smuggler (hereafter referred to as UNIDENTIFIED SUBJECT #1) who agreed to smuggle ZACARIAS-Chacaj further north into the United States for \$3,000, with half to be paid up front. CHAVEZ-Barrios received the smuggling fee from ZACARIAS-Chacaj's husband and as per UNIDENTIFIED SUBJECT #1's instructions, gave the \$1,500 preliminary smuggling fee and ZACARIAS-Chacaj to one of his associates at a location in Alamo, Texas. CHAVEZ-Barrios identified Jesus Lazaro PEREZ on a 6 person photo line-up as looking like UNIDENTIFIED SUBJECT #1's associate who took possession of ZACARIAS-Chacaj and the \$1,500 smuggling fee.

ZACARIAS-Chacaj identified PEREZ on a 6 person photo line-up as looking like the person who took possession of her from CHAVEZ-Barrios and transported her to a location in McAllen, Texas where she was harbored for a short time after.

HSI McAllen received information from Western Union that shows PEREZ was the recipient of a wire transfer in the amount of \$1,500 from ZACARIAS-Chacaj's husband. ZACARIAS-Chacaj's husband was directed

to send the money to PEREZ by UNIDENTIFIED SUBJECT #1 or harm would be caused to ZACARIAS-Chacaj.

HSI McAllen received documents and surveillance video from an HEB grocery store that shows PEREZ, using his state identification, withdrawing the \$1500 sent by ZACARIAS-Chacaj's husband from one of their business centers.